



SCHEURER & HARDY, P.C.
Attorneys and Counselors at Law

1674 Broadway
7th Floor
New York, NY 10019

Telephone 212.262.0900
Facsimile 212.977.7620

March 25, 2004

BY OVERNIGHT EXPRESS MAIL

Federal Election Commission
Office of the General Counsel
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR5408/Mr. & Mrs. La Van Hawkins

Dear Counsel:

We are the attorneys for the above-named respondents, Mr. & Mrs. La Van Hawkins. We submit this letter brief in opposition to the complaint and amended complaint filed against the Sharpton 2004 campaign which named Mr. & Mrs. Hawkins as co-respondents.

The entirety of the amended complaint addresses issues which are not relevant or related to any conduct alleged as to our clients and therefore no action can or should be taken against our clients based upon the allegations within the amended complaint.

The complaint contains a series of allegations concerning conduct engaged in by our clients which arise from an Ebony magazine article in April 2003. Specifically, two paragraphs which allege that Mr. & Mrs. Hawkins held a private fund-raising dinner at their home for Rev. Al Sharpton. The defect in these allegations is that nowhere in the article are our clients quoted in any way, shape or form as indicating the party at their home that evening was a fundraiser for Rev. Al Sharpton.

Indeed, the party at our client's home referred to in the article was a pre-NBA All Star game weekend party. The National Basketball Association's All Star game was held in Atlanta that year and as is always the case when a major event featuring significant involvement by the African-American community is held in Atlanta, our clients often hosts parties in association with the weekend activities. This was true when Atlanta hosted the NFL's Super bowl a few years ago and is true annually for the TRUMPET Awards ceremony held in Atlanta.

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FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL

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Federal Election Commission
Office of the General Counsel

Re: **MUR5408/Mr. & Mrs. La Van Hawkins**

March 25, 2004

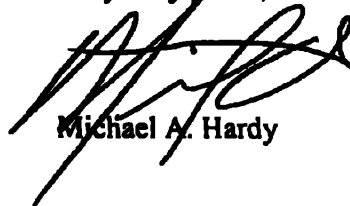
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Mr. & Mrs. Hawkins specifically deny that there was any "shake down" of guests for donations to Rev. Al Sharpton. Nor did they collect any monies for Rev. Sharpton at their party. Neither did they send their private plane to specifically pick up Rev. Sharpton before heading to Atlanta. Mr. Hawkins, who conducts his business in Detroit during the weekdays travels by jet to his home in Atlanta. Mr. Hawkins was aboard his jet when it traveled from Detroit to Atlanta that weekend.

The remaining allegations in the complaint are frivolous or are gratuitous comments on the lifestyle of Mr. & Mrs. Hawkins, as private citizens.

Respondents, Mr. & Mrs. Hawkins, respectfully submit that there is no legal justification set forth in the complaint as it relates to them, that there has been a possible violation of the Federal Election Campaign Act of 1971, as amended. They respectfully urge this matter be closed.

Very truly yours,



Michael A. Hardy

MAH:cc:file:client

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